

EXHIBIT 15

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED : Case Number:
STATES VIRGIN ISLANDS : 1:22-cv-
Plaintiff, : 10904-JSR
v. :
JPMORGAN CHASE BANK, N.A. :
Defendant/Third-Party :
Plaintiff. :

JPMORGAN CHASE BANK, N.A. :
Third-Party Plaintiff, :
v. :
JAMES EDWARD STALEY :
Third-Party Defendant. :

MAY 24, 2023
HIGHLY CONFIDENTIAL

Videotaped deposition of
STEPHEN CUTLER, taken pursuant to notice,
was held at the law offices of Boies
Schiller Flexner LLP, 55 Hudson Yards,
New York, New York, commencing at
9:40 a.m., on the above date, before
Amanda Dee Maslynsky-Miller, a Certified
Realtime Reporter and Notary Public in
and for the State of New York.

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1 And then he writes back,
2 Spoke with Jay -- that's Jay Lefkowitz at
3 Kirkland & Ellis, correct?

4 A. I believe so.

5 Q. He represented Epstein in
6 state plea/fed NPA process.

7 Do you see that?

8 A. I do.

9 Q. He said that he and Epstein
10 have heard nothing to suggest that
11 there's a current FBI or other law
12 enforcement agency investigation,
13 believes any pre-plea conduct is subsumed
14 within plea NPA. Acknowledges that there
15 could be a current investigation he
16 doesn't know about, but doesn't think
17 likely.

18 Do you see that?

19 A. I do.

20 Q. So Jay Lefkowitz did not
21 confirm to you, one way or the other,
22 whether or not there was an
23 investigation, just that he, at least,
24 stated to Jonathan Schwartz he was not

1 aware, correct?

2 A. I read this to have him say
3 neither he nor his client is aware of
4 such an investigation. That doesn't
5 definitively mean that there wasn't.

6 Q. And at the SEC when you were
7 investigating potential wrongdoers, you
8 would not necessarily make it publicly
9 known or known to the potential target
10 that you were investigating them,
11 correct?

12 A. I would say most of the time
13 targets would know. But, sure, there
14 would be occasions where the target would
15 not know.

16 Q. Or there would be
17 potentially part -- during part of the
18 investigation where the target wouldn't
19 know yet, and then at some point later in
20 the investigation you might, for example,
21 issue a Wells notice, correct?

22 A. Yeah, you would -- if -- I
23 don't mean to quarrel with you, but you
24 would likely have heard of an